### Attachment A

### Metro

# Environmental groups ask EPA to regulate runoff

By Nikita Lalwani | GLOBE CORRESPONDENT JULY 11, 2013

Conservation groups petitioned the Environmental Protection Agency Wednesday to regulate facilities that generate polluted runoff, part of a campaign to force companies to take responsibility for their environmental impact.

Under the Clean Water Act, the main federal law governing water pollution, most cities must ensure that new buildings are designed to limit runoff. But most pollution comes from existing private property — like scrap metal plants, universities, hospitals, and large retail chains — that cities are often powerless to regulate.

CONTINUE READING BELOW ▼

It is this loophole that the petition is meant to address, said Christopher Kilian, Clean Waters and Healthy Forest program director for the Conservation Law Foundation, one group behind the action. The EPA reserves the power to regulate private buildings at its discretion, he said, and the petition asks the agency to exercise that authority in New England, the mid-Atlantic, the Southwest, California, and Hawaii.

"If a company is contributing to a water-quality problem, it should be regulated," Kilian said. "Storm water pollution is the most significant remaining source of pollution in our waterways."

The EPA said Wednesday it plans to review the petition, filed jointly by environmental groups including the Conservation Law Foundation, and American Rivers.

"EPA is also working with communities across the country to advance the use of green infrastructure, supported integrated planning for water infrastructure, and provide technical assistance for storm water projects," the statement read.

When rain or snow falls on undeveloped land, it is generally absorbed by plants and soil. But when it falls on streets or parking lots, the water continues flowing, picking up oil, dirt, and toxic substances before returning to rivers and streams. To reduce polluted runoff, buildings can design contoured parking lots that guide water toward garden beds, Kilian said, or install "green roofs" with plants that absorb the rain. Installing a filter at the end of water pipes works as well, he added.

#### CONTINUE READING BELOW ▼

Polluted runoff decreases water quality, erodes shores, and destroys fish and other aquatic life. According to the petition, polluted storm water was responsible in 2000 for more than 38,000 miles of impaired rivers and 79,000 acres of impaired wetlands, numbers that Kilian said remain accurate today.

In New Hampshire, storm water has contributed to more than 80 percent of statewide water quality impairment, the petition said. In Rhode Island, roughly 75 percent of yearly beach closures can be traced to runoff pollution.

In Boston's Mystic River, one of the waterways highlighted in the petition, much of the pollution stems from "unpermitted, uncontrolled storm water runoff," Kilian said. The river, running 7 miles from Medford and Arlington to Boston Harbor, usually earns low marks on the annual federal water quality report card. The Conservation Law Foundation has sued scrap metal plants along the river for lacking proper permits to discharge industrial pollutants.

Environmental advocates framed the petition in terms of economic justice: Why should cities — and, ultimately, taxpayers — bear the brunt of the cost for pollution, they asked, when they were responsible for only a small subset?

"Our local governments are bearing the burden all by themselves," said Rebecca Hammer, an attorney at the Natural Resources Defense Council. "They are not getting a lot of help from the private property owners who are actually often the root of the problem."

Jeffrey Odefey, director of the storm water program at American Rivers, said transferring responsibility to companies might mobilize businesses to adopt more progressive ways to limit runoff pollution. He said storm water must be managed more equitably.

And the cost to companies in the short term could be outweighed by benefits to society in the long term, said Kilian. Poor water quality damages public health, ecosystems, and tourism. Building greener infrastructure could drive up surrounding property values, he said, and create jobs.

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## **Attachment B**

#### 3. WATER POLLUTION:

#### Greens petition EPA to set stormwater rules for developed property

Annie Snider, E&E reporter
Published: Wednesday, July 10, 2013

Concerned that a long-delayed EPA stormwater regulation won't impose restrictions on the amount of polluted water that can run off already-built parking lots and strip malls into waterways, environmental groups today filed petitions aimed at forcing action by U.S. EPA regional offices in Boston, Philadelphia and San Francisco.

The Conservation Law Foundation, Natural Resources Defense Council, American Rivers and a number of local groups filed <u>petitions</u> today urging EPA regions 1, 3 and 9 to exert a rarely used Clean Water Act authority to set stormwater management requirements for sources that are contributing to violations of state water quality standards.

Stormwater, which picks up chemicals and dirt as it flows over streets and parking lots, is one of the primary sources of pollution into U.S. waterways, and in most regions it is growing.

EPA is working on a stormwater rule that is expected to set the first-ever national requirements for private property owners to curb stormwater runoff. The rule is long overdue, though, and the agency last week bumped it down to a "long-term action" in its "Spring 2013 Unified Agenda" -- a signal that it's likely not coming anytime soon (*Greenwire*, July 8).

Industry, which is broadly concerned about the potential costs of the pending rule, is most worried about the prospect of a retrofit requirement that would force owners to alter their current property. Such fixes are the most expensive, officials say (*Greenwire*, July 5).

Environmental groups, however, say the agency has indicated it is unlikely to take a hard line on retrofits in the regulation and decided to try a different tack.

"We don't see a firm commitment from EPA to do anything to address discharges from the already-built environment," said Jeff Odefey, director of stormwater programs for American Rivers. "There's a nationwide need to address these sources. ... We're not prescribing a solution -- we're asking for a process that will identify solutions."

The environmental groups are urging EPA to use its Residual Designation Authority under the Clean Water Act to develop a stormwater permitting program. That authority -- written into the 1972 law as a fail-safe for when other programs aren't able to clean up pollution -- gives the agency flexibility to deal with factors negatively affecting water quality.

Odefey said that the three regions were selected based on where the groups involved had staff and expertise, and that the ultimate goal would be to create a model that could be used throughout the country.

The New England-based Conservation Law Foundation has successfully petitioned EPA to use its Residual Designation Authority in the past. The agency created stormwater management programs under that authority for five impaired brooks in Burlington, Vt., and the urban Long Creek in southern Maine.

The group also filed a petition for the Upper Charles River in the Boston area. There, EPA developed a pilot stormwater permitting program for three municipalities using its Residual Designation Authority but put it on hold after a cost study estimated that it would take \$300 million to implement, said Hamilton Hackney, a lawyer with Greenberg Traurig LLP who represents developers and municipalities and worked closely on the issue.

"Based on those numbers, you start doing the math for what's being suggested now at the regional level -- those numbers just get eye-popping really fast," he said.

Hackney said he expects that industry would organize robust opposition if the agency agreed to move forward with the plan proposed by greens.

"Ultimately, I suppose what's going to happen is it's going to end up before a federal district court judge," he said.

**Click here** for one of the petitions.

## **Attachment C**

Home > News

# New England environmental groups petition EPA to crack down on businesses and institutions whose sites are sources of pollution

July 11, 2013 01:00 AM
BY RICHARD SALIT
JOURNAL STAFF WRITER
rsalit@providencejournal.com On
Twitter @RichSalit

The Conservation Law Foundation and other environmental groups announced on Wednesday that they are petitioning the Environmental Protection Agency in New England and elsewhere in the country to hold industrial, commercial and institutional property owners responsible for pollutants carried off their sites by stormwater.

Instead of putting the responsibility on taxpayer-supported municipal stormwater systems to deal with the pollution, property owners should be forced to address the oil, dirt and toxins that rainwater washes off their roofs and parking lots, the petition claims. Among the major sources of this pollution are malls, big-box retail stores and sprawling paved parking areas.

"It's entirely fair and appropriate to ask someone who is causing a pollution problem to be accountable and to clean up their fair share of the problem in the public interest," said Christopher Kilian, senior attorney with CLF.

The petition urges EPA to exercise its authority under the federal Clean Water Act's Residual Designation Authority to manage runoff from sources in violation of state water quality standards. Pollutants in runoff include lead, zinc, copper, nitrogen and phosphorous.

In addition to EPA's New England region, the petitions were filed in the mid-Atlantic and Southwest-California regions. Under the petition process, EPA has 90 days to accept or deny the request, Kilian said. Its decision could ultimately be challenged in a federal court.

Kilian acknowledged that property owners could face costly mandates to curb runoff, such as replacement of pavement with permeable surfaces and installation of rain gardens that naturally filter pollutants. But it would be unfair to require only developers of new sites to meet such standards, and the improvements needed around the country could help create green jobs, he said.

With predictions that climate change will produce stronger storms, he said, "A problem of this magnitude can't be solved stream by stream. It requires regional solutions to stem this tide of pollution and achieve cleaner water for everyone."

Kilian said that efforts to educate the public have brought a greater public awareness of the significant role that stormwater plays in water pollution problems.

"What people don't understand is that the biggest commercial actors — that own literally millions of acres of pavement and rooftops — are not being required to do their part," he said. The problem, he said, "is that EPA has written a set of regulations that creates a loophole or safe harbor when it comes to the largest privately owned stormwater sources."

CLF is a leading environmental organization in New England. In Rhode Island, the group has sued EPA over Aquidneck Island communities' discharges into Narragansett Bay and the ocean and has waged a legal fight against a Massachusetts sewage treatment plant's emissions into the Blackstone River.

Among the other major groups filing petitions are the Natural Resources Defense Council and American Rivers. They were joined by a handful of local environmental groups.

### **Attachment D**

# Appeals court deals setback to L.A. County in storm-water case



Storm water bursts through heavy steel gate valves and flows into the Los Angeles River in Long Beach. The concrete-lined river carries rainwater beneath the Willow Street Bridge and out to the Pacific. (Don Bartletti / Los Angeles Times)

#### **By ABBY SEWELL**

AUGUST 8, 2013, 3:04 PM



he U.S. 9th Circuit Court of Appeals dealt a setback to Los Angeles County on Thursday in a long-running lawsuit over storm-water pollution.

The Natural Resources Defense Council and Santa Monica Baykeeper -- now Los Angeles Waterkeeper -- sued the county flood control district in 2008 over pollution in the Los Angeles and San Gabriel rivers, alleging that the flood control district had violated its storm water permit.

The lawsuit cited high pollution readings at monitoring stations in the rivers.

County officials have argued that the flood control district is not primarily to blame for the pollution in the rivers, because there are dozens of cities discharging polluted runoff upstream from the monitoring sites.

Last year, the 9th Circuit ruled that the county was liable for pollution in the rivers, and referred to the water flowing from the "concrete channels" into the natural part of the lower river as

discharges of pollutants.

The U.S. Supreme Court in January reversed that opinion, saying that water flowing from one "concrete" section of the river to another section cannot be deemed a "discharge" of pollutants. It

did not rule on a number of other issues raised in the case.

The 9th Circuit issued an opinion Thursday saying that the county is still liable for excessively high

pollution levels detected at monitoring stations in county waterways.

The panel found that accepting the county's interpretation of the permit requirements would lead

to "an unreasonable result."

"Under the County Defendants' reading of the Permit, individual Permittees could discharge an unlimited amount of pollutants ... but never be held liable for those discharges based on the results of the emissions monitoring, even though that monitoring is explicitly intended to assess whether

Permittees are in compliance" with discharge limitations, the opinion said.

Unless the county appeals, the case will go back to the federal district court to determine how the

county will be required to fix the violations.

Kerjon Lee, a spokesman for the flood control district, said county officials are still reviewing the

decision.

Steve Fleischli, senior attorney and director of NRDC's national water program, called the decision

"a significant milestone."

"I think this case demonstrates that there is accountability built into the system, and if the county

avoids that, they will be held liable," he said.

ALSO:

9 Powerball tickets in California come oh-so-close to jackpot

Amber Alert: Relationship between missing girl, suspect unclear

Man suspected of killing mom's boyfriend, hiding body in freezer

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## **Attachment E**

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### Supreme Court denies petition to hear Los Angeles stormwater case

Mon, May 5 2014

#### By Mica Rosenberg

(Reuters) - The U.S. Supreme Court on Monday declined to review a ruling that found Los Angeles County liable for pollution runoff into Southern California rivers after big rain storms, in a decision hailed by environmentalists who brought the case.

The Natural Resources Defense Council, or NRDC, filed a lawsuit in 2008 arguing the county was responsible for contamination of billions of gallons of stormwater flowing into drains and then into the Los Angeles and San Gabriel rivers.

Rainwater mixes with a slurry of toxic chemicals and fecal bacteria from city streets. The suit alleged that pollution ending up in the rivers exceeded what was allowed by the county's permit, in violation of federal water quality laws.

Last August, the 9th U.S. Circuit Court of Appeals sided with the NRDC. By refusing to take up the case, the Supreme Court allowed that ruling to stand.

"This puts an end to questions of liability; the county has run out of appeals on whether it violated the Clean Water Act," said Steve Fleischli, a senior NRDC attorney. Now the case will return to the district court to determine how to remedy the violations, he said.

Los Angeles County has monitoring stations down river to test if levels of pollutants meet the standards of its National Pollutant Discharge Elimination System permit, which covers water runoff from more than 80 cities.

The flood control district manages a massive system of around 500 miles of open channel and 2,800 miles of storm drains.

The county has argued that it should not be held liable for violations of the permit because the data does not exactly show where the discharge is coming from and there are so many sources of water flowing into the system.

"This could force municipalities to redirect limited public funds from other critical services to spend on controlling pollution from private and other sources who are the responsible parties," Gail Farber, director of the Los Angeles County public works department, said in a statement.

The NRDC wants the county to build green infrastructure projects to help curb the runoff, like installing rain barrels or planting parks that collect or absorb the stormwater.

But it is not clear yet what remedy - if any - the district court will determine is needed in the case, said Howard Gest, who served as outside counsel for Los Angeles county.

He said the NRDC case is based on an outdated permit from 2001 that was updated in 2012. Under the new permit, the city is already building multi-use projects to deal with the stormwater, he said.

The county is likely to continue fighting the case which has made it to the Supreme Court before. In January 2013, the high court ruled in the county's favor on a very narrow question about what constitutes "discharge" of pollutants.

The case is Los Angeles County Flood Control District, et al. v. Natural Resources Defense Council, et al., Supreme Court of the United States, No. 13-901.

(Editing by Ken Wills)

(This story corrects the name of the council to Natural from National in the second paragraph)

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# **Attachment F**

#### How clean is your favorite beach?



Hampton Beach State Park in New Hampshire is a "superstar" when it comes to water quality. Other beaches didn't fare so well.

(CNN) -- Most beaches look idyllic at first glance, but as you head to the shore this summer, what's really lurking in the water you're bathing in?

Sharks and jellyfish aren't the only things to worry about, it turns out.

Pollution from storm water runoff and sewage overflows continue to plague the country's beaches, according to the 21st annual beachwater

quality report released Wednesday by the Natural Resources Defense Council.

"With the Fourth of July fast approaching, Americans nationwide are breaking out their swimsuits, loading up their cars and heading to the beach," said David Beckman, water program director for the nonprofit environmental group.

"It's a summer rite of passage, but unfortunately it can also make you sick."

The report, which focuses on information from the previous vacation season, found that U.S. beaches saw the second-highest number of closing and advisory days in more than 20 years last year -- up 29% from 2009.

The council attributed the rise to oil washing up in the Gulf of Mexico from the BP disaster, as well as heavy rainfall in Hawaii and contamination from unidentified sources in California.

In fact, more than a year after the BP spill, the effects linger. As of June 15, 2011, four beach segments in Louisiana that have been closed since the disaster have yet to open, and three beaches in Florida have remained under oil spill notice, the council said.

The report's main feature is a five-star rating guide to 200 of the nation's most popular beaches.

Stars were awarded if a beach rarely, if ever, violated the national water quality standard in 2010; if it kept up that record for the last three years; if it was monitored more than once a week; if any advisories were issued promptly; and if beachgoers were notified both online and via signs on the beach of any problems.

For the first time, the council awarded "superstar" status to four beaches that received five stars this year as well as the past three years, indicating a history of very good water quality.

The "superstar" beaches are:

- Rehoboth Beach-Rehoboth Avenue Beach in Sussex County, Delaware
- Dewey Beach in Sussex County, Delaware
- Park Point Lafayette Community Club Beach in St. Louis County, Minnesota
- Hampton Beach State Park in Rockingham County, New Hampshire

On the other side of the spectrum, the council also named "the top 10 repeat offenders," or beaches that stand out as having persistent contamination problems. They include:

- Three sections of Avalon Beach in Los Angeles County, California
- Cabrillo Beach Station in Los Angeles County, California
- Two sections of Doheny State Beach in Orange County, California
- Keaton Beach in Taylor County, Florida
- North Point Marina North Beach in Lake County, Illinois
- Beachwood Beach West in Ocean County, New Jersey
- Villa Angela State Park in Cuyahoga County, Ohio
- Ropes Park in Nueces County, Texas
- Eichelman Beach in Kenosha County, Wisconsin
- South Shore Beach in Milwaukee, Wisconsin

Nationally, the most common reason officials cited for closing beaches or issuing advisories last year was bacteria levels that exceeded quality standards, the council said. That indicates the presence of human or animal waste in the water.

It's a serious issue because polluted beachwater can cause stomach flu, skin rashes, pinkeye, respiratory infections, meningitis, and hepatitis, the report said.

Children are especially vulnerable, perhaps because they submerge their heads more often and are more likely to swallow water when swimming.

For more information about your favorite destination, check out the council's guide to finding a clean beach.

### Attachment G

#### THE WALL STREET JOURNAL.

WSJ.com

June 27, 2012, 4:45 PM ET

### Groups Warn of Disease Risks at Beaches and Lakes

ByLaura Landro



Hannah Arista/Docuvitae

As the summer swimming season gets into full swing, environmental groups and public-health agencies are warning of mounting disease risks at beaches and lakes due to storm-water runoff, sewage pollution and other forms of contamination.

The nonprofit Natural Resources Defense Council Wednesday released its <u>annual beach-water-quality</u> <u>report</u> showing that U.S. beaches last year had the third-highest number of closing and advisory days in more than two decades. The list includes 15 "repeat offenders" that have had persistent contamination issues over the last five years in California, Illinois, Louisiana, New Jersey and New York.

Earlier this month the federal Environmental Protection Agency <u>issued a report on the 2011 swimming season</u> at 3,650 monitored beaches. The agency found the percentage of beaches with one or more notifications of a potential risk to public health rose to 43% last year from 37% in 2010 and 33% in 2007. One reason was heavier-than-usual rainfall-based advisories in Hawaii, New York and Connecticut.

According to the Centers for Disease Control and Prevention, there has been a substantial increase in recent years in the number of recreational water illnesses and infections. Germs are picked up by swallowing, breathing in mists or aerosols or having skin or wounds in contact with contaminated waters, including swimming pools where poor human hygiene spreads illness.

The EPA estimates that up to 3.5 million people in the U.S. become ill from contact with raw sewage from sewer overflows each year. That number could actually be higher because people who get sick from swimming in polluted waters aren't always aware of the cause of their illness and don't report it to local

health officials.

Besides adding to health costs, beach closings due to contamination can hurt local economies. One study estimated economic losses as a result of closing a Lake Michigan beach due to pollution could be as high as \$37,030 a day.

In October, the EPA is due to publish new or revised recreational-water-quality criteria to replace standards dating back to 1986.

The NRDC says the draft recommendations the EPA published in December don't go far enough to protect the public, saying they would still permit 1 in 28 swimmers to become ill.

NRDC senior attorney <u>Jon Devine</u> says the EPA needs to "reform and rigorously enforce national requirements to ensure runoff is controlled" using innovative "green" solutions such as roadside plantings and porous pavements to help store and evaporate runoff. Polluted runoff from storm water is the biggest known source of contamination.

The EPA says it is updating recommendations based on comments it received. But the agency takes issue with the NRDC's position, saying that when properly implemented the recommendations would protect more than 99% of swimmers from gastrointestinal illnesses over a swimming season. The agency says it is also helping communities build and properly operate sewage plants, working to control overflows to reduce them as much as possible, and working with the U.S. Coast Guard to reduce discharges from boats and ships.

The NRDC and EPA use data from state, county and local governments for their annual reports. But the data lag by a year. For more current information, many communities issue their own weekly or monthly reports on conditions at beaches. That allows swimmers to make their own judgments as to whether it is safe to swim, says <a href="Mangelo-Bellomo">Angelo Bellomo</a>, director of Environmental Health in the Los Angeles County Dept. of Public Health.

Mr. Bellomo says the county is working with another nonprofit group, Heal the Bay, which also reports on water quality. The county is also working with the town of Avalon — whose beaches on Catalina Island are one of the top repeat offenders in the NRDC report — to determine what the causes of its polluted beaches are, including sewage, and how best to respond.

Mr. Bellomo says the NRDC and EPA annual reports are important to help tackle the broader issue of persistent pollution, and decide what investments to make to bring down contamination levels. "There is a very good argument to be made that this can be better controlled," he says.

One bright spot: Heal the Bay's own <u>annual Beach Report Card</u>, which graded beaches from A to F, gives 93% of the state's 441 beaches an A or B grade largely due to improvements in L.A. County.

## **Attachment H**

### Beach bound? Read this before you go near the water

**DISPATCHES** 

Jayne Clark, US A TODAY

1:10 p.m. EDT June 26, 2013



(Photo: Hannah Arista Photography)

test results at 3.000 beaches.

The good news about the annual <u>Beach Report (http://www.nrdc.org/water/oceans/ttw/default.asp)</u>from the <u>Natural Resources Defense Council (http://www.nrdc.org/)</u>: The water quality of the nation's most popular beaches hasn't degraded since last year.

The bad news: It hasn't improved much, either.

In its 23rd annual report, out today, the NRDC says high bacteria levels in the water caused beach closings or advisories on a cumulative 20,000-plus days in 2012. The results are detailed in <u>Testing the Waters: A Guide to Water Quality at Vacation Beaches (http://www.nrdc.org/water/oceans/ttw/default.asp)</u>, which examines EPA

For the second year, NRDC has a <u>searchable by zip code map (http://www.nrdc.org/beaches)</u> that enables beach-bound vacationers to check recent water-quality information.

"Pollution levels have remained constant and we're still seeing the same unacceptable level of closings and advisories every year," NRDC senior attorney Jon Devine told USA TODAY.

The primary cause of beach water pollution is storm runoff from roadways, parking lots and other hardscapes, Devine noted, adding the NRDC wants the EPA to enact stricter rules on how cities manage that runoff.

Swimming in contaminated water can cause a host of maladies from gastrointestinal ailments to pinkeye, though linking an illness to a day at the beach is "extremely under reported," Devine said. "People don't know that water can contain viruses, bacteria and other parasites that make you sick. And when they get sick they don't associate the two."

Overall, the Great Lakes region had the highest violation rates, with 10% of the water samples not meeting clean-water standards. The best scores were from the Delmarva area with 3% of samples in violation.

States with the highest violation rates: Ohio (21%); Wisconsin (14%) and Minnesota (12%). States with the fewest violations: Delaware (less than 1%); New Hampshire (1%); and North Carolina (2%).

NRDC awards up to five stars to 200 popular vacation beaches based on low violation rates, frequent water testing and prompt public notification when there is a problem.

The five-star winners:



RECOMMENDED FOR YOU

Marijuana at airports: Colo., Wash.,
adjust to new laws

- Alabama: Gulf Shores Public/Beach in Baldwin Gounty 6/10/2020 2010 2010
- · Alabama: Gulf State Park Pavilion in Baldwin County
- · California: Bolsa Chica Beach in Orange County
- California: Newport Beach in Orange County (2 of 3 monitored sections)
- · California: San Clemente State Beach in Orange County
- · Delaware: Dewey Beach Dagsworthy in Sussex County
- · Delaware: Rehoboth Beach in Sussex County
- Maryland: Ocean City at Beach 6 in Worcester County
- Michigan: Bay City State Recreation Area in Bay County
- Minnesota: Park Point Franklin Park / 13th Street South Beach Park Point in St. Louis County

- Minnesota: Lafayette Community Club Beach in St. Louis County
- New Hampshire: Hampton Beach State Park in Rockingham County
- New Hampshire: Wallis Sands Beach in Rockingham County

The 11 repeat offenders — beaches where water samples exceeded public health standards more than 25% of the time from 2008-2012:

- · California: Avalon Beach in Los Angeles County (4 of 5 monitored sections)
- · California: Doheny State Beach in Orange County (6 of 7 monitored sections)
- · California: Poche County Beach in Orange County
- · Indiana: Jeorse Park Beach in Lake County
- · New Jersey: Beachwood Beach in Ocean County
- · New York: Ontario Beach in Monroe County
- · Ohio: Lakeshore Park in Ashtabula County
- · Ohio: Euclid State Park in Cuyahoga County
- · Ohio: Villa Angela State Park in Cuyahoga County
- · Ohio: Edson Creek in Erie County
- · Wisconsin: South Shore Beach in Milwaukee County

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#### **USA NOW**



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Jun 19, 2014